

1 Georlen Spangler, Esq.
Nevada Bar No. 3818
2 LAW OFFICE OF GEORLEN K. SPANGLER
2620 Regatta Drive, Suite 102
3 Las Vegas, Nevada 89128
Phone: 702.381.5830
4 E-Mail: spanglerlaw@outlook.com
Attorneys for Defendant

5 ***Admitted Pro Hac Vice***
6 Iwana Rademaekers, TX Bar No. 16452560
LAW OFFICES OF IWANA RADEMAEKERS, P.C.
7 14785 Preston Road, Suite 550
Dallas, Texas 75254
8 Main: (214) 579-9319
Fax: (469) 444-6456
9 Email: iwana@rademaekerslaw.com
Attorneys for Defendant

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 ABOLFAZL HOSSEINPOUR,)	CASE NO.: 2:18-CV-01371-JAD-CWH
)	
13 Plaintiff,)	
)	
14 vs.)	<u>STIPULATION AND ORDER TO</u>
)	<u>EXTEND DEADLINES</u>
15 LIBERTY LIFE ASSURANCE COMPANY)	
16 OF BOSTON as Claims Administrator for)	(SECOND REQUEST)
the Safeway, Inc. Group Disability Income)	
17 Plan; DOES I through V; and ROE)	
18 CORPORATIONS I through V, inclusive,)	
)	
19 Defendants.)	

20
21 IT IS HEREBY STIPULATED by the parties hereto, by and through their
22 undersigned counsel of record that, pursuant to LR 26-4, the discovery schedule as set forth
23 in the Scheduling Order dated September 25, 2018 [docket 12], be amended as follows:

24 **I. Discovery Completed**

25 Defendant provided the proposed Administrative Record (AR) to Plaintiff for review
26 on October 10, 2018. Plaintiff notified Defendant of his position as to the content of the AR,
and served discovery requests, on November 13, 2018. Defendant served its objections and

1 responses to the requests on December 12, 2018. The Joint Administrative Record (AR) was
2 filed with this Court on November 28, 2018.

3 **II. Discovery Remaining and Reason for Request for Extension**

4 FRCP Rule 52/56 motions are currently due by March 1, 2019. The parties are
5 currently discussing a potential settlement in this matter. Progress has been made, but these
6 discussions have not yet been completed and the Parties need an additional 7 days to
7 complete settlement negotiations and, if settlement attempts fail, prepare and file dispositive
8 motions. Accordingly, the parties request that the Court extend the deadline by 7 days for
9 these purposes.

10 **III. Proposed Discovery Schedule**

11 Plaintiff HOSSEINPOUR and Defendant LIBERTY agree and stipulate to the
12 following proposed deadline extensions:

<u>Description:</u>	<u>Current Deadline:</u>	<u>Proposed:</u>
FRCP Rule 52/56 Motions	03/01/19	03/08/19
Responses to Motions	03/22/19	03/29/19
Replies	04/05/19	04/12/19

17 We, the undersigned, represent to the Court that this request for extension is made in
18 good faith and not for purposes of delay.

19 WHEREFORE, the parties jointly request that this Court adopt the proposed
20 scheduling deadlines as indicated above.

21 DATED: February 27, 2018

LAW OFFICE OF JULIE A. MERSCH

22 By: /s/ Julie A. Mersch
23 Julie A. Mersch, Esq.
jam@merschlaw.com
24 Nevada Bar No.: 004695
1100 E. Bridger Ave.
25 Las Vegas, NV 89101
Attorney for Plaintiff Abolfazl
26 Hosseinpour

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DATED: February 27, 2019

LAW OFFICES OF IWANA
RADEMAEKERS, P.C.

By: /s/ Iwana Rademaekers
Iwana Rademaekers, Esq.
iwana@rademaekerslaw.com
Admitted Pro Hac Vice
14785 Preston Road, Suite 550
Dallas, Texas 75254

Georlen Spangler, Esq.
Nevada Bar No. 3818.
LAW OFFICE OF GEORLEN K.
SPANGLER
2620 Regatta Dr., Ste. 102
Las Vegas, Nevada 89128
spanglerlaw@outlook.com
*Attorneys for Defendant LIBERTY
LIFE*

IT IS SO ORDERED:

Dated this 28th day of February 2019.



UNITED STATES MAGISTRATE JUDGE